IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF VIRGINIA

Richmond Division

IN RE:)	
)	
CHRISTIE MARIE LISBON)	Case No. 19-31894-KLP
)	Chapter 13
Debtor		-

MOTION TO EXPEDITE HEARING ON MOTION TO INCUR DEBT AND TO SHORTEN NOTICE PERIOD

COMES NOW the Debtor, by counsel, and moves this Court to Expedite the Hearing on her Motion to Incur Debt and to Shorten Notice Period, and in support thereof states as follows:

- 1. The Debtor filed this case under Chapter 13 of the U.S. Bankruptcy Code on April 8, 2019.
- 2. The Debtor has applied for and Mechanicsville Honda has approved a loan to the Debtor in the amount of \$19,304.27 plus interest at 14.75% per annum to be repaid with 72 equal monthly payments of \$408.83 for the purchase of a 2018 Honda HR-V or similar vehicle.
- 3. The Debtor needs to purchase the referenced vehicle because Debtor's current vehicle has some serious mechanical problems, and she needs a replacement vehicle to continue to travel to and from work and other matters.
- 4. The purchase of the vehicle is in the best interest of the Debtor and will facilitate Debtor's ability to perform under the Chapter 13 Plan filed herein.
 - 5. The Debtor's Chapter 13 Plan has been confirmed.

James E. Kane (VSB #30081) KANE & PAPA, P.C. 1313 East Cary Street Richmond, VA 23219 (804) 225-9500 (phone) (804) 225-9598 (fax) Counsel for Debtor Case 19-31894-KLP Doc 33 Filed 04/02/21 Entered 04/02/21 12:37:22 Desc Main Document Page 2 of 9

WHEREFORE, the Debtor respectfully requests that the Court expedite the hearing on their Motion to Incur Debt, Shorten the Notice Period required for said Motion, waive the 14-day stay pursuant to Fed. R. Bankr. Proc. 8014(a), and for such other and further relief as is just and proper.

Dated: April 2, 2021 CHRISTIE MARIE LISBON

By: /s/ James E. Kane Counsel

James E. Kane (VSB #30081) KANE & PAPA, P.C. 1313 East Cary Street Richmond, VA 23219 (804) 225-9500 (phone) (804) 225-9598 (fax) Counsel for Debtor

CERTIFICATION

- I, James E. Kane, pursuant to Local Rule 9013-1(N), do hereby certify that:
- 1. I have carefully examined the matter and concluded that there is a true need for an emergency hearing,
 - 2. I have not created the emergency through any lack of due diligence.
 - 3. I have made a *bona fide* effort to resolve the matter without hearing.

By: <u>/s/ James E. Kane</u> James E. Kane Case 19-31894-KLP Doc 33 Filed 04/02/21 Entered 04/02/21 12:37:22 Desc Main Document Page 3 of 9

CERTIFICATE OF SERVICE

I hereby certify that on April 2, 2021, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all parties registered to receive notice thereof and will mail the same by first class mail, postage pre-paid, to the parties on the attached list.

/s/ James E. Kane Counsel for Debtor

IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF VIRGINIA

Richmond Division

IN RE:)	
)	
CHRISTIE MARIE LISBON)	Case No. 19-31894-KLP
)	Chapter 13
Debtor)	

NOTICE OF MOTION AND HEARING

The above Debtor has filed papers with the Court to request an order to Expedite the hearing and to Shorten the Notice Period with respect to her Motion to Incur Debt.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion, then, you or your attorney must:

• File with the court, at the address shown below, a written request for a hearing [or written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for a hearing (or response) to the court for filing, you must mail it early enough so the court will <u>receive</u> it on or before the date stated above, to:

Clerk of Court United States Bankruptcy Court 701 East Broad Street Richmond, VA 23219

You must also mail a copy to:

James E. Kane, Esquire KANE & PAPA, P.C. 1313 East Cary Street Richmond, Virginia 23219

Attend a hearing scheduled for April 14, 2021 at 10:00 a.m. at U.S. Bankruptcy Court, 701 East Broad Street, Room 5100, Richmond, VA 23219. If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.

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If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Dated: April 2, 2021 CHRISTIE MARIE LISBON

By: /s/ James E. Kane Counsel

James E. Kane (VSB #30081) KANE & PAPA, P.C. 1313 East Cary Street Richmond, VA 23219 (804) 225-9500 (phone) (804) 225-9598 (fax) Counsel for Debtor Case 19-31894-KLP Doc 33 Filed 04/02/21 Entered 04/02/21 12:37:22 Desc Main Document Page 6 of 9

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Clerk of Court using the CM/ECF system, which will then send a notification of such filing

(NEF) to all parties registered to receive notice thereof and will mail the same by first class mail,

postage pre-paid, to the parties on the attached list.

/s/ James E. Kane

Counsel for Debtor

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Case 19-31894-KLP
Label Matrix for local noticing
0422-3
Case 19-31894-KLP
Eastern District of Virginia
Richmond
Fri Apr 2 10:49:26 EDT 2021
United States Bankruptcy Court

AR Resources, Inc. Attn: Bankruptcy Po Box 1056 Blue Bell, PA 19422-0287 Advance Financial ATTN: Virginia Billing 100 Oceanside Drive Nashville TN 37204-2351

, NJ 07666-1713

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Allied Cash Advance 5000 Nine Mile Road Suite A Richmond, VA 23223-5733

701 East Broad Street

Richmond, VA 23219-1888

Ashley Funding Services, LLC Resurgent Capital Services PO Box 10587 Greenville, SC 29603-0587

701 East Broad St., Suite 4304 Richmond, VA 23219-1849

(p)ATLAS ACQUISITIONS LCC 492C CEDAR LANE SUITE 442 TEANECK NJ 07666-1713

Bank of Missouri PO Box 89725 Sioux Falls, SD 57109-9725 Bon Secours P.O. Box 409601 Atlanta GA 30384-9601 Bon Secours PO Box 1123 Minneapolis, MN 55440-1123

Bridgecrest Attn: Bankruptcy 7300 E Hampton Ave, Ste 100 Mesa, AZ 85209-3324 Bridgecrest Credit Company, LLC PO BOX 29018 PHOENIX, AZ 85038-9018 Cash 2 U Financial Service 3131 Mechanicsville Turnpike Richmond, VA 23223-1722

Cash Net USA P.O.Box 643990 Cincinnati, OH 45264-0309 Cawthorn, Deskevich & Gavin 9701 Metropolitan Court Suite C Richmond, VA 23236-3694 Commonwealth Financial 245 Main Street Scranton, PA 18519-1641

Commonwealth Radiology 1508 Willow Lawn Dr. Ste 117 Richmond, Va. 23230-3421 Credit Acceptance 25505 West 12 Mile Rd Suite 3000 Southfield, MI 48034-8331 Credit One Bank P.O. Box 60500 City of Industry, CA 91716-0500

Debt Recovery Solution Attn: Bankruptcy P.O. 9003 Syosset, NY 11791-9003 Fingerhut 6250 Ridgewood Road Saint Cloud MN 56303-0820 First Premier Bank Attn: Bankruptcy Po Box 5524 Sioux Falls, SD 57117-5524

First Virginia 9121 Staples Mill Road Henrico, VA 23228-2026 (p) FOCUSED RECOVERY SOLUTIONS 9701 METROPOLITAN COURT STE B RICHMOND VA 23236-3690 Henrico Doctors Hospital 1602 Skipwith Rd Henrico, VA 23229-5298

Henrico Doctors Hospital Resurgent Capital Services PO Box 1927 Greenville, SC 29602-1927 IC System
PO Box 64794
Saint Paul MN 55164-0794

James River Emergency Group P.O. Box 660827 Dallas TX 75266-0827 Case 19-31894-KLP (p) JEFFERSON CAPITAL SYSTEMS LLC PO BOX 7999 SAINT CLOUD MN 56302-7999

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LNV F Dictument Page 8 of 9

PO Box 10497

Greenville, SC 29603-0497

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LVNV Funding, LLC
Resurgent Capital Services
PO Box 10587
Greenville, SC 29603-0587

Medicredit P O 1629 Maryland Heights MO 63043-0629 Mid American Bank 5109 S Broadband Lane Sioux Falls, SD 57108-2208

NPRTO South-East, LLC 256 W. Data Drive Draper, Utah 84020-2315

Ortho Virginia 1115 Boulders Parkway Ste 200 Richmond, VA 23225-4067 Patient First P.O. Box 758941 Baltimore, MD 21275-8941

Patient First c/o Receivables Management Sys PO Box 73810 North Chesterfield, VA 23235-8047

(p)PORTFOLIO RECOVERY ASSOCIATES LLC PO BOX 41067 NORFOLK VA 23541-1067

Premier Bankcard, Llc Jefferson Capital Systems LLC Assignee Po Box 7999 Saint Cloud Mn 56302-7999 Progressive Leasing 256 West Data Drive Draper, UT 84020-2315

Quantum3 Group LLC as agent for CF Medical LLC PO Box 788 Kirkland, WA 98083-0788

Receivable Management 7206 Hull Street Rd Ste 211 Richmond, VA 23235-5826 Resurgent Capital PO Box 10497 Greenville, SC 29603-0497

Rolfe Emergency Physicians P.O. Box 37934 Philadelphia, PA 19101-0000

Speedy Cash PO Box 780408 Wichita, KS 67278-0408 Synchrony Bank/Care Credit Attn: Bankruptcy Dept Po Box 965060 Orlando, FL 32896-5060

Total Visa P O Box 5220 Sioux Falls, SD 57117-5220 Transworld Sys
500 Virginia Dr
Ste 514
Fort Washington, PA 19034-2733

Tuckahoe Orthopaedic Assoc. P.O. Box 71690 Henrico, VA 23255-1690

Verizon by American InfoSource as agent 4515 N Santa Fe Ave Oklahoma City, OK 73118-7901 Verizon Virginia 500 Technology Drive Suite 300 Weldon Springs, MO 63304-2225 Virgina Physicians, Inc. P.O. Box 487 Mechanicsville VA 23111-0487

Virginia Credit Union Attn: Bankruptcy Department Po Box 90010 Richmond, VA 23225-9010 Virginia Credit Union Inc PO Box 90010 Richmond, VA 23225-9010 Virginia Ear Nose & Throat 3450 Mayland Court Henrico VA 23233-1468

Virginia Ear Nose & Throat Associates c/o Nguyen Ballato 2201 Libbie Ave Richmond, VA 23230-2364 Virginia Eye Institute 400 Westhampton Station Richmond, VA 23226-3332 Virginia Eye Institute 8002 Discovery Drive Suite 410 Richmond, VA 23229-8601 Case 19-31894-KLP irgina Physicians, Inc.
P.O. Box 487
Mechanicsville VA 23111-0487

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341 Dial 866-813-0912 Code: 8576180

P. 0. Box 1819

Richmond, VA 23218-1819

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James E. Kane
Kane & Papa, PC
1313 East Cary Street
P.O. Box 508
Richmond, VA 23218-0508

John P. Fitzgerald, III
Office of the US Trustee - Region 4 -R
701 E. Broad Street, Ste. 4304
Richmond, VA 23219-1849

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Atlas Acquisitions LLC 492C Cedar Lane, Ste 442 Teaneck, NJ 07666 Focused Recovery Solutions Attn: Bankruptcy 9701 Metropolitan Ct. Suite B Richmond, VA 23236-0000 Jefferson Capital Systems LLC Po Box 7999 Saint Cloud Mn 56302-9617

Portfolio Recovery Associates, LLC POB 41067 Norfolk VA 23541

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u) Credit Acceptance Corp.

End of Label Matrix
Mailable recipients 64
Bypassed recipients 1
Total 65